

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA**

NAUTILUS INSURANCE COMPANY,

Plaintiff,

v.

RICHARD ALEXANDER MURDAUGH,
Sr., CORY FLEMING, MOSS & KUHN, P.A.,
CHAD WESTENDORF, and PALMETTO
STATE BANK,

Defendants.

Case No. 2:22-cv-1307-RMG

**PLAINTIFF'S OBJECTIONS TO
DEFENDANTS' WITNESS LISTS**

Nautilus Insurance Company ("Nautilus") objects to Defendants' witness lists as follows.

Witnesses

Nautilus objects to the inclusion as a witness by Defendant Moss & Kuhn, P.A. ("M&K") of Jan Malinowski. Mr. Malinowski is the CEO of Palmetto State Bank, and was not included on prior witness lists submitted by M&K. The subject matter and relevance of Mr. Malinowski's testimony has not been disclosed to Nautilus. On this basis, Nautilus reserves all objections regarding Mr. Malinowski's testimony.

Nautilus further reserves the right to challenge the specific testimony of any witness on any proper basis.

[signatures on following page]

Respectfully submitted:

This 24th day of December, 2024
Charleston, South Carolina

/s/ Jaan Rannik
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